

UNITED STATES OF AMERICA

v.

IVANJOEL ARYEETEEY,

Defendant.

23 MAG 6864

COMPLAINT

Violation of 18 U.S.C. § 922(g)(1)

COUNTY OF OFFENSE:
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

SANDY NUNEZ, being duly sworn, deposes and says that he is a Detective with the New York Police Department (“NYPD”), and charges as follows:

COUNT ONE

(Possession of a Firearm After a Felony Conviction)

1. On or about September 5, 2023, in the Southern District of New York and elsewhere, IVANJOEL ARYEETEEY, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit, one Taurus USA 9mm caliber pistol, and the firearm was in and affecting commerce.

(Title 18, United States Code, Section 922(g)(1).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. I am a Detective with the NYPD. This affidavit is based on my personal participation in the investigation of this matter, my conversations with other law enforcement officers, my conversations with officers of the United States Probation Office for the Southern District of New York (“Probation”), and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my review of the criminal history record of IVANJOEL ARYTEETEEY, the defendant, I have learned the following:

a. In or about June 4, 2020, ARYEETEEY pleaded guilty in the United States District Court for the Southern District of New York to racketeering conspiracy, in violation of Title 18, United States Code, Sections 1962(d). On June 23, 2020, ARYEETEEY was sentenced to a term of imprisonment of 60 months, to be followed by 3 years’ supervised release.

4. Based on my conversations with law enforcement officers, as well as my review of law enforcement reports, I have learned, among other things, the following:

a. On or about September 5, 2023, at approximately 5:27 p.m., in the vicinity of East 163rd Street and 3rd Avenue in the Bronx, New York, an NYPD officer was riding with three other NYPD officers (“Officer-1,” “Officer-2,” “Officer-3,” and “Officer-4,” collectively, with a fifth officer (“Officer-5”) who later participated in the apprehension of ARYEETAY, the “Officers”) in an unmarked police car. Officer-1 observed a gray Honda (the “Vehicle”) with a Black male driver (the “Suspect”) and a Black female passenger (the “Passenger”). Officer-1 observed that the Suspect was not wearing a seatbelt.

b. Officer-1 activated his lights and attempted to stop the Vehicle, but the Vehicle did not stop. The Vehicle continued until it crashed into a parked car in the vicinity of East 164th Street and Washington Avenue in the Bronx, New York.

c. When the Vehicle crashed, the Suspect exited the Vehicle and fled northbound on foot.

d. Officer-2, Officer-3, and other officers pursued the Suspect.

e. Officer-2 observed that the Suspect was carrying a green bag when he exited the Vehicle. Officer-2 also observed that the Suspect was wearing black jeans, a white shirt, and white sneakers.

f. While other officers pursued the Suspect, Officer-1 remained at the Vehicle and arrested the Passenger. Officer-1 questioned the Passenger, who explained that when the Officers activated their lights, the Suspect said, in sum and substance, that “they are going to pull me over.” The Passenger indicated that she asked the Suspect “why,” and then looked over and “noticed that he didn’t have his seatbelt on.”

g. While fleeing, the Suspect threw the green bag he was carrying over a fence into the area of a construction site. A witness (“Witness-1”) observed the Suspect throw the green bag and flagged down Officer-4 and another NYPD officer (“Officer-5”), who had joined the pursuit of the suspect. Witness-1 informed Officer-4 that the Suspect had thrown a bag over the fence.

h. Officer-4 and Officer-5 entered the construction site and recovered the green bag and a loaded Taurus USA 9mm pistol (the “Firearm”), which had partly slid out of the bag. A still image of the Firearm is copied below.



i. The pursuing officers observed the Suspect on the roof of an Auto Body Repair Shop (the “Auto Body Shop”) located in the vicinity of 403-505 East 165th Street in the Bronx, New York. The Officers questioned one of the proprietors of the Auto Body Shop who indicated the direction in which the Suspect had run and informed the officers that the Auto Body Shop has security cameras. At this point, the Officers lost track of the Suspect.

j. On September 27, 2023, the NYPD recovered surveillance footage from a building in the vicinity of 1016 Washington Avenue in the Bronx, New York. The surveillance footage shows the Suspect throwing a bag over a fence into the area of the construction site at or about 5:28 p.m.

k. On or about September 5, 2023, officers recovered surveillance footage from the Auto Body Shop. The surveillance footage shows the Suspect walking in the Auto Body Shop, bending over to catch his breath, and apparently talking to the individuals working in the Auto Body Shop.

Identification of Aryeetey as the Suspect

5. Based on my participation in this investigation, conversations with law enforcement officers and the probation officer of IVANJOEL ARYEETAY, the defendant, (“Probation Officer-1”) and my review of documents, photographs, and surveillance video, I believe that ARYEETAY is the Suspect. Specifically, I have learned the following, in substance and in part:

a. After recovering the Firearm and arresting the Passenger, NYPD officers conducted an inventory search of the Vehicle. During the search, the officers recovered a probation identification card bearing the likeness of and identifying information for IVANJOEL ARYEETAY.

b. On October 4, 2023, NYPD officers showed a still image from the surveillance footage from the Auto Shop to Probation Officer-1, who identified the Suspect as IVANJOEL ARYEETAY, the defendant.

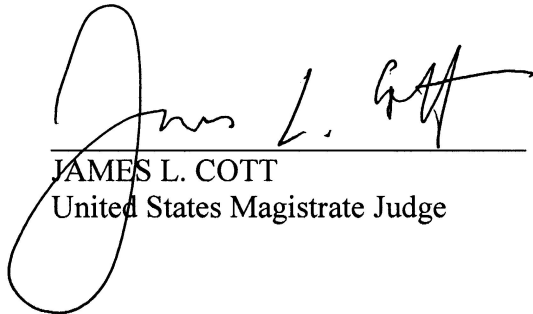
c. On October 5, 2023, at approximately 10:11 a.m., the United States Marshals Service arrested IVANJOEL ARYEETAY, the defendant.

6. I have communicated with a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, who is familiar with the manufacture of firearms, and who has confirmed that the Firearm was manufactured outside of the State of New York.

WHEREFORE, I respectfully request that IVANJOEL ARYEETAY, the defendant, be imprisoned or bailed, as the case may be.

/s/ Sandy Nunez, by the Court, with permission
SANDY NUNEZ
Detective
New York Police Department

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this 19th day of October, 2023.



JAMES L. COTT
United States Magistrate Judge